

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

THE CITY OF HUNTINGTON,  
Plaintiff,

v.

CIVIL ACTION NO. 3:17-01362

AMERISOURCEBERGEN  
DRUG CORPORATION, et al.,  
Defendants.

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CABELL COUNTY COMMISSION,  
Plaintiff,

v.

CIVIL ACTION NO. 3:17-01665

AMERISOURCEBERGEN  
DRUG CORPORATION, et al.,  
Defendants.

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**JOINT STATEMENT REGARDING THE STATUS OF DISCOVERY MOTIONS**

In accordance with the Court's February 17, 2021 order (ECF No. 1225), the parties submit this joint statement regarding the status of the following discovery motions:

- **Motion by Public Employees Insurance Agency to Quash Subpoena (ECF No. 260):** This motion is moot by agreement of the Public Employees Insurance Agency and Defendants.
- **Motion by Cabell Huntington Hospital to Quash (ECF No. 309):** This motion was withdrawn by agreement between Cabell Huntington Hospital and Defendants.
- **Renewed Motion to Quash filed by Public Employees Insurance Agency (ECF No. 420):** This motion is moot by agreement of the Public Employees Insurance Agency and Defendants.

- **Motion by ABDC to Compel Discovery from the Office of the Chief Medical Examiner (ECF No. 428):** This motion has been resolved by agreement between the Office of the Chief Medical Examiner and Defendants.
- **Motion by ABDC to Compel Discovery from the West Virginia Bureau for Children and Families (ECF No. 430):** This motion is now moot.
- **Defendants' Motion to Compel In Camera Review and Production (ECF No. 432):** This motion has been resolved by agreement between the parties.
- **Plaintiffs' Motion to Compel Defendants to Withdraw Privilege Claims and for In Camera Review of Privilege Claims (ECF No. 439):** This motion has been resolved by agreement between the parties.
- **Motion by West Virginia Department of Health and Human Resources to Quash (ECF No. 441):** This motion is now moot.
- **Plaintiffs' Motion to Compel 30(b)(6) Depositions (ECF No. 468):** This motion has been resolved by agreement between the parties.
- **Motion by Bill J. Crouch, Cabinet Secretary for the West Virginia Department of Health and Human Resources to Quash Subpoena (ECF No. 499):** This motion is now moot.
- **Motion by West Virginia Department of Health and Human Resources to Quash (ECF No. 500):** This motion is now moot.
- **Motion by Governor's Council on Substance Abuse and Prevention and Treatment to Quash (ECF No. 501):** This motion is now moot.
- **Motion by ABDC to Compel Discovery from Cabell Huntington Hospital and St. Mary's Medical Center (ECF No. 521):** This motion has been resolved by agreement between the Cabell Huntington Hospital, the St. Mary's Medical Center and Defendants.

The parties, by their undersigned counsel, hereby submit this response jointly.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that on this 3<sup>rd</sup> day of March, 2021 the foregoing document was served using the Court's CM/ECF system, which will send notification of such filing to all counsel of record.

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